

Issues to be discussed with the City of Bolivar, Missouri

Administrative Order for Compliance on Consent – EPA Docket No. CWA-07-2007-0068

A. Status of implementation of Plan of Action (POA) and Continuing Improvement Plan (CIP)

Please provide information indicating whether the following commitments identified in the POA and CIP (*identified in italics*) have been completed and describe the results achieved:

- 1) *Initial cleaning and CCTV inspection of entire collection system to be completed by December 2010 (POA commitment) followed by annual inspection of 10% of the system (POA and CIP commitment)***
 - a) Was the initial cleaning and inspection of the entire system completed, and if so, by what date?
 - b) Has inspection of 10% of the system annually been conducted?
 - c) If the initial cleaning and inspection of the entire system has not been completed, please provide an explanation of the delay and a time frame for completing it.
- 2) *Replacement of all vented manhole lids to be completed by June 2013 (POA commitment)***
 - a) What is the total number of vented lids replaced to date and the percentage of vented lids that number represents.
 - b) If not all vented manhole lids have been replaced, please provide an explanation for the delay and a date when 100% replacement will be achieved.
- 3) *Annual assessment of a basin representing 10% of the system (POA and CIP commitment)***
 - a) *Perform wet weather flow monitoring in April.*
 - i) Identify the specific basins and years in which this has been conducted since 2008.
 - ii) If wet weather monitoring for the entire system has not been completed, please explain why not and provide a time frame for completing the remaining monitoring.
 - b) *Perform dry weather flow monitoring and smoke testing in July and August.*
 - i) Identify the specific basins and years in which this has been conducted since 2008.
 - ii) If dry weather flow monitoring and smoke testing of the entire system has not been completed, please explain why not and provide a time frame for conducting the remaining flow monitoring and testing.
 - c) *Review flow data each September to determine appropriate corrective actions.*
 - i) Identify the specific basins and years in which flow data review and identification of corrective actions was conducted since 2008.
 - ii) Provide a listing of the problems identified in each basin and any recommended corrective actions.
 - iii) Identify the specific corrective actions taken as a result of this assessment and when each action was completed.
 - iv) If not all recommended corrective actions have been taken, provide a schedule for taking the necessary actions.

d) *Each October prepare a budget for the following year (POA and CIP commitment). Annual expenditures of \$320,000 to address inflow & infiltration (I&I) from utility revenue with additional funding required provided by borrowing to be repaid through utility revenue (CIP commitment).*

- i) For each year beginning with 2009, provide a list of specific I&I assessment and corrective actions completed, and their costs.
- ii) If the total annual expenditures on I&I assessment and correction in any year were less than the projected \$320,000, provide an explanation for the lower amount.
- iii) Provide a schedule and projected annual expenditures for additional I&I assessment and correction.

4) *Revision of schedules or conclusions of CIP to be made in January of even numbered calendar years (CIP commitment).*

- a) Please indicate whether the CIP has been reviewed since 2008 and provide a copy of any revisions to the CIP.

5) *Capacity analysis of all significant sanitary sewer mains to be completed by December 2011 (POA and CIP commitment)*

- a) Was the capacity analysis completed? If so, by what date?
- b) Identify the proposed corrective actions for each deficiency identified by the analysis.
- c) If analysis has not been completed, please explain the delay and provide a time frame for completing the capacity analysis.

6) *Conduct a study by December 2009 to estimate the wet weather capacity of the WWTP (POA commitment).*

- a) Has this study been completed? If so, please provide a copy of the final report and a brief explanation of the findings.
- b) If it has not yet been completed, provide the current status of the study, the planned completion date and an explanation of the delay in completion of the study.

B. September 2012 Inspection and Bolivar Responses to Notice of Potential Violation (NOPV)

Please provide additional information regarding the City's responses to the NOPV.

1) **NOPV 1&2:** The City's response to this NOPV contains no reference to the Data Management System (DMS) previously submitted to and approved by the EPA.

- a) Is the approved DMS being used to document and track sewer complaints?
- b) If the DMS has been revised or replaced, please provide a copy of the revised/new system.
- c) Explain how your current data management process provides all the necessary information to manage your collection system.

- 2) **NOPV 3:** The City's response to this NOPV provided the requested data, but contained no reference to the City's GIS. The City previously reported to the EPA that the collection system had been incorporated into the City's GIS, including the capability for direct upload of CCTV inspection data.
 - a) Has the City incorporated the collection system into the GIS?
 - b) Is CCTV inspection data being uploaded into the GIS?
- 3) **NOPV 7:** The City's response to this NOPV referred to receipt of flow data analysis and recommendations in July 2012, which was followed by smoke testing and scheduling replacement of several sections of sewer mains and manholes where excessive flow was found. Does the flow monitoring that the City has conducted to date provide sufficient information for assessing necessary improvements to ensure adequate capacity of the collection system? If not, what plans does the City have for additional flow monitoring?
- 4) **NOPV 10:** The response to this NOPV referred to budgeting for elimination of Lift Station 3 in 2012 and allocation of funding to address hydraulic capacity issue in South Lillian. The POA submitted to and accepted by the EPA identified December 2011 as the date for completion of the capacity analysis of significant sewer mains. The response to this NOPV implies that deadline was not met.
 - a) Please indicate whether the capacity analysis has been completed, and, if it has, the date of its completion.
 - b) If the capacity analysis has not been completed, when does the City expect it will be completed?

C. Other General Issues

- 1) Periodic reports to the EPA required by the consent order are to contain information regarding I&I sources confirmed during the reporting period and provide either the actual date of correction (if corrected) or the scheduled date for correction (if not corrected). Please be prepared to discuss the sources of I&I identified to date, the corrective actions that have been taken and are planned, and the effect addressing these sources is having on reducing or eliminating SSOs, basement backups and bypasses at the WWTP.
- 2) The wet weather capacity analysis of the WWTP has been reported as delayed awaiting installation of a flow meter to measure plant incoming flow. Please provide an update regarding whether the flow monitoring has now been installed, and if so, provide information resulting from the plant flow analysis. If the flow monitoring has not yet been completed, provide a schedule for installing the flow meter and completing the monitoring.
- 3) Please be prepared to discuss whether actions taken by the City to date have reduced or eliminated the frequency, duration and volume of SSOs, basement backups and/or bypasses at the treatment plant. Please have available for discussion information that supports the City's assessment regarding this matter.